

Exhibit A



June 3, 2022

VIA JAMS ACCESS

Special Master Daniel B. Garrie
dgarrie@jamsadr.com

Re: *In re Facebook, Inc., Consumer Privacy User Profile Litig.*,
JAMS Ref. No. 1200058674

Dear Special Master Garrie and Counsel,

Pursuant to the Amended Order Regarding Search Strings for Mark Zuckerberg and Sheryl Sandberg Custodial Sources (Dkt. 920), the table below reflects Plaintiffs' proposed additional search strings for Mr. Zuckerberg's and Ms. Sandberg's custodial documents, and the one sentence explanation as to why Plaintiffs believe the search strings should be included.

	Search String	Explanation
1.	(friend* or fof* or naf*) w/5 (deprec* or whitelist* or whitlist* or data or info* or perm* or exten* or access* or polic*)	Plaintiffs propose a narrowed version of PL-6 that eliminates reference to certain terms that may have generated false positives, and fills a gap in the current search to target documents pertaining to deprecation of third party access to friend data following FB's F8 announcement that it would end such access, and its subsequent extension of that access to certain business partners.
2.	(user* or segment or target* or audience* or direct or custom) w/5 (psychograph* or behavior* or personal* or priva* or impl* or infer* or profil*)	Plaintiffs propose a narrowed version of PL-36, which is designed to capture documents related to Facebook's and advertisers' use of appended, inferred, and derived user data, without consent, to target and create profiles on users, a topic that is not covered by the current search.

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KELLER ROHRBACK L.L.P.**BLEICHMAR FONTI & AULD LLP**

	Search String	Explanation
3.	(agreement* or contract* or terms or accept* or agree* or consent* or perm* or grant*) w/50 ((video* or movie*) w/5 (upload* or view* or shar* or request* or obtain* or engag* or access* or get or display* or availab* or provide* or integrat* or exten* or watch* or stream* or friend* or identif* or interest* or tag* or conver* or target* or histor* or relat* or “social context” or endpoint* or API*)	Plaintiffs propose a term designed to capture documents responsive to RFP 78, which is not addressed by the prior search, including agreements and communications, between Facebook and third parties related to users uploading, viewing, sharing, requesting, obtaining, or engaging with videos on Facebook.

Plaintiffs are available to address any questions you might have.

Regards,



Anne Davis
adavis@bfalaw.com

cc: Defense Counsel via JAMS Access
Plaintiffs' Counsel via JAMS Access

Exhibit B

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June 3, 2022

VIA JAMS ACCESS

Special Master Daniel B. Garrie
 DGarrie@jamsadr.com

Re: *In re Facebook Consumer Privacy User Profile Litigation*, JAMS Ref No.
 1200058674

Dear Special Master Garrie,

The Special Master's Amended Order Regarding Search Strings for Mark Zuckerberg and Sheryl Sandberg Custodial Sources (ECF No. 920) directed each of the parties to "each . . . propose three additional strings for the Mark Zuckerberg and Sheryl Sandberg custodial sources" and to "including a one sentence explanation as to why the proposing party believes the search strings should be included."

Pursuant to that Amended Order, Facebook proposes the following three search strings.

Search String	Explanation
(friend* or fof* or naf*) w/8 (deprec* or whitelist* or whitelist* or data or perm*)	This proposed string is a narrowed version of PL-6, which Plaintiffs had identified as a priority search string but was not adopted due to its low richness; the richness of the samples of Facebook's revised version is 11%.
(user* and (control* or setting* or priva*)) w/8 (friend* or info* or data*)	This proposed string is a narrowed version of PL-20, which Plaintiffs had identified as a priority search string but was not adopted due to its low richness; the richness of the samples of Facebook's revised version is 16%.
"custom* audience" w/10 (revenue* or ARPU)	This proposed string is a narrowed version of PL-34, which Plaintiffs had identified as a priority search string but was not adopted due to its low richness; the richness of the samples of Facebook's revised version is 19%.

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Special Master Daniel B. Garrie
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Please call me if you have any questions.

Sincerely,

/s/ Rosemarie Ring

Rosemarie Ring

Exhibit C



June 6, 2022

VIA JAMS ACCESS

Special Master Daniel B. Garrie
DGarrie@jamsadr.com

Re: *In re Facebook, Inc., Consumer Privacy User Profile Litig.*,
 JAMS Ref No. 1200058674, Case No. 3:18-md-02843-VC (N.D. Cal.)

Dear Special Master Garrie:

Pursuant to the Amended Order Regarding Search Strings for Mark Zuckerberg and Sheryl Sandberg Custodial Sources (Dkt. 920), the table below reflects Plaintiffs' objections to Facebook's proposed additional search strings for Mr. Zuckerberg's and Ms. Sandberg's custodial documents.

	Facebook's Proposed Search String	Facebook's Explanation	Plaintiffs' Objections
1.	(friend* or fof* or naf*) w/8 (deprec* or whitelist* or whitlist* or data or perm*)	This proposed string is a narrowed version of PL-6, which Plaintiffs had identified as a priority search string but was not adopted due to its low richness; the richness of the samples of Facebook's revised version is 11%.	Plaintiffs object to Facebook's narrowed version of PL-6, because it eliminates relevant terms "info*," "exten*," "access*," and "poli*," each of which pertain to third-party access to friend, friend of friend (fof), and non-app friend (naf) information; i.e., documents referencing extending permissions to access friend information; or granting a policy exception with respect to NAF access. Facebook should test the impact on richness of removing each of these terms, rather than striking them entirely. To the extent that Facebook has already conducted such testing, it should share that information with Plaintiffs.
2.	(user* and (control* or setting* or priva*)) w/8 (friend* or info* or data*)	This proposed string is a narrowed version of PL-20, which Plaintiffs had identified as a priority search string but was not adopted due to its low richness; the richness of the samples of Facebook's	Plaintiffs object to Facebook's narrowed version of PL-20 because it is unclear whether this modified term will return documents not already captured by FB-18, a term that has already been applied against Mr. Zuckerberg's and Ms. Sandberg's custodial documents. Comparing Facebook's narrowed version of PL-20 to FB-18 reveals significant overlap between the terms. Facebook should disclose how many new documents are identified by

Special Master Danie B. Garrie
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KELLER ROHRBACK L.L.P.
BLEICHMAR FONTI & AULD LLP

	Facebook's Proposed Search String	Facebook's Explanation	Plaintiffs' Objections
	<u>FB-18</u> ((User and control*) w/10 (data or info* or setting* or priva*)) w/10 (messag* or risk* or public* or commit*)	revised version is 16%.	this term. For ease of reference, Plaintiffs include FB-18 below. <u>FB-18</u> ((User and control*) w/10 (data or info* or setting* or priva*)) w/10 (messag* or risk* or public* or commit*)
3.	"custom* audience" w/10 (revenue* or ARPU)	This proposed string is a narrowed version of PL-34, which Plaintiffs had identified as a priority search string but was not adopted due to its low richness; the richness of the samples of Facebook's revised version is 19%.	Plaintiffs object to Facebook's narrowed version of PL-34 to the extent that inclusion of either of the deleted terms "amount*" or "\$" would result in a richness score of greater than 10%.

Regards,



Anne Davis
adavis@bfalaw.com

cc: Defense Counsel via JAMS Access
 Plaintiffs' Counsel via JAMS Access

Exhibit D

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June 6, 2022

VIA JAMS ACCESS

Special Master Daniel B. Garrie
 DGarrie@jamsadr.com

Re: *In re Facebook Consumer Privacy User Profile Litigation*, JAMS Ref No.
 1200058674

Dear Special Master Garrie,

The Special Master's Amended Order Regarding Search Strings for Mark Zuckerberg and Sheryl Sandberg Custodial Sources (ECF No. 920) directed each of the parties to "each . . . propose three additional strings for the Mark Zuckerberg and Sheryl Sandberg custodial sources" and to "including a one sentence explanation as to why the proposing party believes the search strings should be included." The order further provided that the "parties may object to [the] additional proposed search strings within three days."

Pursuant to that Amended Order, Plaintiffs proposed the following three search strings, to which Facebook objects for at least the reasons stated below.

Plaintiffs' Proposed Search Strings	Plaintiffs' Explanation	Facebook's Objections
<u>Plaintiffs' Original PL-6 – REJECTED for low richness</u> (friend* or fof* or naf*) w/20 (deprec* or whitelist* or whitelist* or data or info* or perm* or exten* or shar* or access* or "f8" or polic*) <u>Facebook's Version of PL-6, Proposed 6/3—11% Richness</u> (friend* or fof* or naf*) w/8	Plaintiffs propose a narrowed version of PL-6 that eliminates reference to certain terms that may have generated false positives, and fills a gap in the current search to target documents pertaining to deprecation of third party access to friend data following FB's F8 announcement that it would end such access, and its	Facebook objects to proposed string PJ-1, on the grounds that it is overly broad and unduly burdensome, and not proportional to the needs of the case. Moreover, Plaintiffs offer no indication that this string captures unique, non-cumulative information that would not have been captured by other strings. Plaintiffs' Revised Version of PL-6 hits on in excess of 95,000 <u>more</u>

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Special Master Daniel B. Garrie
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Plaintiffs' Proposed Search Strings	Plaintiffs' Explanation	Facebook's Objections
<p>(deprec* or whitelist* or whitelist* or data or perm*)</p> <p><u>Plaintiffs' Revised Version of PL-6, Proposed 6/3 ("PJ-1")¹</u> (friend* or fof* or naf*) w/5 (deprec* or whitelist* or whitelist* or data or info* or perm* or exten* or access* or polic*)</p>	<p>subsequent extension of that access to certain business partners.</p>	<p>documents (<u>without</u> families) than Facebook's Version of PL-6 (as proposed on 6/3), and furthermore adds back many of the generic terms that likely led to the low richness of the original version of PL-6. In any event, Facebook is reviewing a sample of the incremental hits and will report on the richness of the sample by June 10, as required under the Special Master's Order.</p> <p>The differences between Facebook's Version of PL-6 and Plaintiffs' Revised Version of PL-6 are shown in red.</p>
<p><u>Plaintiff's Original Version of PL-36—REJECTED for low richness</u> (target* or reach* or audience* or direct or market* or custom) w/15 (psychograph* or behavior* or personal* or priva* or impl* or infer* or profil*)</p> <p><u>Plaintiffs' Revised Version of PL-36, Proposed 6/3 ("PJ-2")</u> (user* or segment or reach* or target* or audience* or direct or custom) w/5 (psychograph* or behavior* or personal* or priva* or impl* or infer* or profil*)</p>	<p>Plaintiffs propose a narrowed version of PL-36, which is designed to capture documents related to Facebook's and advertisers' use of appended, inferred, and derived user data, without consent, to target and create profiles on users, a topic that is not covered by the current search.</p>	<p>Facebook objects to proposed string PJ-2, on the grounds that it is overly broad and unduly burdensome, and not proportional to the needs of the case. Moreover, Plaintiffs offer no indication that this string captures unique, non-cumulative information that would not have been captured by other strings.</p> <p>More fundamentally, the proposed search was so broad as proposed that Facebook's document review platform returned an error when it ran Plaintiffs' Revised Version of PL-36 because it returned too many</p>

¹ Plaintiffs' June proposals are referred to as "PJ" to distinguish them from the "P" terms previously negotiated and briefed.

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Plaintiffs' Proposed Search Strings	Plaintiffs' Explanation	Facebook's Objections
<p><u>Facebook's Revised Version of PL-36*</u> (user* or segment or target* or audience* or direct or custom) w/5 (psychograph* or behavior* or personal* or priva* or impl* or infer* or profile or profiles)</p> <p>*Facebook reserves all rights, notwithstanding its revision to make the string run in Facebook's document review platform.</p>		<p>hits. For example, PJ-2 would return any document that uses the phrase "user profile," "user privacy" or "user behavior." In addition, Facebook had to limit profil* to "profile or profiles" as indicated at left. With that limitation, the search returned more than 125,000 results (with families).</p> <p>In any event, Facebook is reviewing a sample of the hits and will report on the richness of the sample by June 10, as required under the Special Master's Order.</p> <p>The differences between Plaintiffs' Original Version of PL-36, Plaintiffs' Revised Version of PL-36, and Facebook's Revised Version are shown in red.</p>
<p>PJ-3: (agreement* or contract* or terms or accept* or agree* or consent* or perm* or grant*) w/50 ((video* or movie*) w/5 (upload* or view* or shar* or request* or obtain* or engag* or access* or get or display* or availab* or provide* or integrat* or exten* or watch* or stream* or friend* or identif* or interest* or tag* or conver* or target* or histor* or relat* or "social context" or endpoint* or API*)</p>	<p>Plaintiffs propose a term designed to capture documents responsive to RFP 78, which is not addressed by the prior search, including agreements and communications, between Facebook and third parties related to users uploading, viewing, sharing, requesting, obtaining, or engaging with videos on Facebook.</p>	<p>Facebook objects to this proposed search string ("PJ-3"), on the grounds that it is overly broad and unduly burdensome, and not proportional to the needs of the case. Moreover, Plaintiffs offer no indication that this string captures unique, non-cumulative information that would not have been captured by other strings.</p> <p>This search string hit on more than 11,000 documents (with families). In any event, Facebook is reviewing a sample of the hits and will report</p>

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Special Master Daniel B. Garrie
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Plaintiffs' Proposed Search Strings	Plaintiffs' Explanation	Facebook's Objections
		on the richness of the sample by June 10, as required under the Special Master's Order.

Please call me if you have any questions.

Sincerely,

/s/ Rosemarie Ring

Rosemarie Ring